

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                              |   |                        |
|------------------------------|---|------------------------|
| IN RE: MATTHEW R. KNOCHE and | : | CHAPTER 13             |
| JENNIFER A. KNOCHE           | : |                        |
| Debtor(s)                    | : |                        |
|                              | : |                        |
| JACK N. ZAHAROPOULOS         | : |                        |
| STANDING CHAPTER 13 TRUSTEE  | : |                        |
| Movant                       | : |                        |
|                              | : |                        |
| vs.                          | : |                        |
|                              | : |                        |
| MATTHEW R. KNOCHE and        | : |                        |
| JENNIFER A. KNOCHE           | : |                        |
| Respondent(s)                | : | CASE NO. 1-21-bk-01101 |

TRUSTEE’S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 24th day of June, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor(s)’ disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Plan payment calculation sum of Lines 34, 35, 36 45 and 46.
2. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:
  - a. The plan is underfunded relative to claims to be paid – 100% plan.  
(Pending claims bar date)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

#### CERTIFICATE OF SERVICE

AND NOW, this 29th day of June, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Ferry, Jr., Esquire  
931 Cumberland Street  
Lebanon, PA 17042

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee